

McCormick, Barstow, Sheppard,
Wayte & Carruth LLP
Jonathan W. Carlson
Nevada Bar No. 10536
jonathan.carlson@mccormickbarstow.com
Cheryl A. Grames
Nevada Bar No. 12752
Cheryl.grames@mccormickbarstow.com
Stacy Norris
Nevada Bar No. 15445
snorris@mccormickbarstow.com
8337 West Sunset Road, Suite 350
Las Vegas, Nevada 89113
Telephone: (702) 949-1100
Facsimile: (702) 949-1101

Attorneys for GEICO CASUALTY COMPANY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA, SOUTHERN DIVISION

AZIZA KINNEY,

Plaintiff,

v.

GEICO CASUALTY COMPANY; and DOES
1 THROUGH 100, INCLUSIVE,

Defendants.

Case No. 2:20-cv-02167-GMN-NJK

**REQUEST TO EXTEND DEADLINE TO
FILE JOINT PRETRIAL ORDER**

COME NOW PLAINTIFF AZIZA KINNEY ("Plaintiff"), by and through her counsel of record, Mona Asberom, Esq. and James Leonard Brown, Esq. of Asberom & Brown, LLC, and DEFENDANT GEICO CASUALTY COMPANY, by and through its counsel of record, Jonathan W. Carlson, Esq., Cheryl A. Grames, Esq., and Stacy Norris, Esq. of McCormick, Barstow, Sheppard, Wayte & Carruth LLP, and request an extension of the current deadline for filing the Joint Pretrial Order to Monday May 17, 2023. The current deadline (Monday May 3, 2023) was set forth in the Order as to the parties' competing Motions for Partial Summary Judgment (ECF No. 40), which Order was filed on March 31, 2023.

Counsel for the parties have been in steady communication regarding the drafting of the Joint Pretrial Order, and have a working draft to which both have contributed. Counsel conferred

1 on Tuesday April 18, 2023 and made progress as to achieving agreement on a number of items that
2 must be discussed and included in the Joint Pretrial Order. Due to summary judgment having been
3 granted in part and denied in part, the parties are carefully constructing ways to streamline the
4 presentation of evidence and what, if anything, can be argued in advance of trial as to questions of
5 law. Counsel have agreed to a second conference, but the scheduling of same has proven
6 challenging. Counsel have tentatively agreed to confer again on Tuesday April 25, 2023. In an
7 abundance of caution, however, counsel believe a short extension is necessary to ensure sufficient
8 time to revise the final version of the Joint Pretrial Order and have time for a final conference should
9 one be necessary. To that end, the parties request an extension of two weeks to and including

10 **Monday May 17, 2023.**

11 ///

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 The parties maintain that good cause exists for this brief extension as counsel have been
2 actively working together to file a Joint Pretrial Order that the Court will accept forthwith.

3 DATED: April 24, 2023

4 ASBEROM & BROWN, LLC

5 By /s/James Leonard Brown
6 Mona Asberom, Nevada Bar No. 3674
7 James Leonard Brown, Nevada Bar No. 3686
8 2211 Paradise Road
9 Las Vegas, Nevada 89104
10 Tel. (702) 733-8818

11 Attorneys for Plaintiff

12 DATED April 24, 2023

13 McCORMICK, BARSTOW, SHEPPARD,
14 WAYTE & CARRUTH LLP

15 By: /s/Stacy Norris
16 Jonathan W. Carlson
17 Nevada Bar No. 10536
18 Cheryl A Grames
19 Nevada Bar No. 12752
20 Stacy Norris
21 Nevada Bar No. 15445

22 Attorneys for GEICO CASUALTY COMPANY

23 **IT IS SO ORDERED.**

24 DATED this 24 of April, 2023

25 
26 U.S. District Court Judge / U.S. Magistrate Judge